

LAW OFFICES OF ANTHONY L. COVIELLO, LLC
307 Montgomery Street
Bloomfield, New Jersey 07003
973-748-4600
Attorney(s) for Plaintiff(s)
Our File No.: 201921

Plaintiff(s)

CHANITA MASSENBERG-MEDINA

vs.

WALTER HICKS; CELADON TRUCKING
SERVICES, INC. L ABC CORPORATIONS
1-5 (name being fictitious)

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY

DOCKET NO.:

Civil Action

COMPLAINT
and
JURY DEMAND

Plaintiff, CHANITA MASSENBERG-MEDINA, residing at 611 Chestnut Street,
in the Township of Union, County of Essex , and State of New Jersey, by way of
complaint against the defendants above says:

FIRST COUNT

1. On or about January 15, 2020, the plaintiff, CHANITA MASSENBERG-MEDINA, was operating her automobile in a reasonable and careful manner on a public roadway in the City of Irvington, State of New Jersey.

2. At the aforementioned time and place the defendants, CELADON TRUKING SERVICES, INC., (hereinafter "CELADON") and/or ABC CORPORATIONS 1-5 (name being fictitious but used to describe any person or entity with ownership, control, management or supervision of a 2015 Volvo with Indiana plate 2347346), which vehicle was being operated in a careless, reckless and negligent manner by the defendant, WALTER HICKS, as the agent, servant or employee of CELADON and/or ABC CORPORATIONS 1-5(name being fictitious) .

3. As a proximate result of the negligence of defendant, WALTER HICKS, the vehicles did collide.

4. As a direct and proximate result of the negligence of the defendant, WALTER HICKS, the plaintiff sustained severe, grievous and permanent injuries for which she brings this lawsuit.

WHEREFORE, Plaintiff, CHANITA MASSENBERG-MEDINA, demands judgement against the defendants, CELADON TRUKING SERVICES, INC; ABC CORPORATIONS 1-5 (name being fictitious) ; and WALTER HICKS, jointly and severally, individually and collectively, for compensatory damages, together with counsel fees, interest and costs of suit.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Anthony L. Coviello, Esq., is hereby designated trial counsel in the within matter.

JURY DEMAND

Plaintiff herein demands a trial by jury as to all issues and counts of the complaint.

LAW OFFICES OF ANTHONY L. COVIELLO, LLC
Attorneys for Plaintiff

BY: 

ANTHONY L. COVIELLO

Dated: January 22, 2021

RULE 4:5-1 CERTIFICATION

1. I am the attorney for the plaintiff in the foregoing complaint.
2. The matter in controversy is not the subject of any pending arbitration proceeding or other action and no arbitration proceeding is contemplated in the future.
3. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

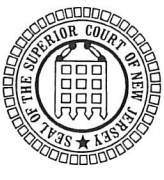
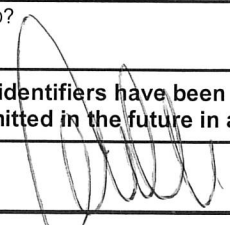
LAW OFFICES OF ANTHONY L. COVIELLO, LLC
Attorneys for Plaintiff(s)

BY: 

ANTHONY L. COVIELLO

DATED: January 22, 2021

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY	
	Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule</i> 4:5-1 Pleading will be rejected for filing, under <i>Rule</i> 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO. _____ AMOUNT: _____ OVERPAYMENT: _____ BATCH NUMBER: _____	
	ATTORNEY / PRO SE NAME ANTHONY L. COVIELLO, ESQ.		TELEPHONE NUMBER (973) 748-4600	
	COUNTY OF VENUE Essex		DOCKET NUMBER (when available)	
	FIRM NAME (if applicable) LAW OFFICES OF ANTHONY L. COVIELLO, LLC		OFFICE ADDRESS 307 MONTGOMERY STREET BLOOMFIELD, NJ 07003	
NAME OF PARTY (e.g., John Doe, Plaintiff) CHANITA MASSENBERG-MEDINA		CAPTION CHANITA MASSENBER-MEDINA v. WALTER HICKS; CELADON TRUKING SERVICES, INC; JOHN DOES 1-5, et als		
CASE TYPE NUMBER (See reverse side for listing) 603Y	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.				
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION				
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION				
DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with <i>Rule</i> 1:38-7(b).				
ATTORNEY SIGNATURE: 				

Side 2



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under *Rule 4:5-1*

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE – PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE – PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE – PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT – OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)

- | | |
|-----------------------------------------|-----------------------------------------------------------|
| 271 ACCUTANE/ISOTRETINOIN | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 297 MIRENA CONTRACEPTIVE DEVICE |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR |
| 282 FOSAMAX | 300 TALC-BASED BODY POWDERS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 601 ASBESTOS |
| 286 LEVAQUIN | 623 PROPECIA |
| 287 YAZ/YASMIN/OCELLA | 624 STRYKER LFIT CoCr V40 FEMORAL HEADS |
| 289 REGLAN | 625 FIREFIGHTER HEARING LOSS LITIGATION |
| 291 PELVIC MESH/GYNECARE | 626 ABILIFY |
| 292 PELVIC MESH/BARD | 627 PHYSIOMESH FLEXIBLE COMPOSITE MESH |
| 293 DEPUY ASR HIP IMPLANT LITIGATION | 628 TAXOTERE/DOCETAXEL |
| 295 ALLODERM REGENERATIVE TISSUE MATRIX | 629 ZOSTAVAX |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59

LAW OFFICES OF ANTHONY L. COVIELLO, LLC
307 Montgomery Street
Bloomfield, New Jersey 07003
973-748-4600
Attorney(s) for Plaintiff(s)
Attorney Bar ID No.: 022471981

Plaintiff(s)

CHANITA MASSENBERG-MEDINA

vs.

WALTER HICKS; CELADON TRUCKING
SERVICES, INC.; A&S SERVICES GROUP,
LLC; ABC CORPORATIONS 2-5 (name
being fictitious)

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY

DOCKET NO.: ESX-L-3903-21

Civil Action
**SECOND
AMENDED
COMPLAINT
and
JURY DEMAND**

Plaintiff, CHANITA MASSENBERG-MEDINA, residing at 611 Chestnut Street,
in the Township of Union, County of Essex , and State of New Jersey, by way of
complaint against the defendants above says:

FIRST COUNT

1. On or about January 15, 2020, the plaintiff, CHANITA MASSENBERG-MEDINA, was operating her automobile in a reasonable and careful manner on a public roadway in the City of Irvington, State of New Jersey.

2. At the aforementioned time and place the defendants, WALTER HICKS and/or CELADON TRUCKING SERVICES, INC., (hereinafter "CELADON"), A&S SERVICES GROUP, LLC., and/or ABC CORPORATIONS 1-5 (name being fictitious but used to describe any person or entity with ownership, control, management or supervision of a 2015 Volvo with Indiana plate 2347346 or truck trailer being hauled by the said WALTER HICKS), which vehicle was being operated in a careless, reckless and negligent manner by the defendant, WALTER HICKS, as the agent, servant or employee of CELADON, A&S SERVICES GROUP, LLC., and/or ABC CORPORATIONS 1-5 (name being fictitious) .

3. As a proximate result of the negligence of defendant, WALTER HICKS, the vehicles did collide.

4. As a direct and proximate result of the negligence of the defendant, WALTER HICKS, the plaintiff sustained severe, grievous and permanent injuries for which she brings this lawsuit.

WHEREFORE, Plaintiff, CHANITA MASSENBERG-MEDINA, demands judgement against the defendants, WALTER HICKS and/or CELADON TRUCKING SERVICES, INC; A&S SERVICES GROUP, LLC.; ABC CORPORATIONS 1-5 (name being fictitious) ; and WALTER HICKS, jointly and severally, individually and collectively, for compensatory damages, together with counsel fees, interest and costs of suit.

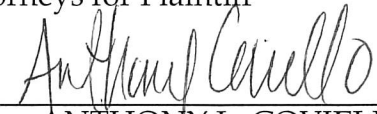
DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Anthony L. Coviello, Esq., is hereby designated trial counsel in the within matter.

JURY DEMAND

Plaintiff herein demands a trial by jury as to all issues and counts of the complaint.

LAW OFFICES OF ANTHONY L. COVIELLO, LLC
Attorneys for Plaintiff

BY: 
ANTHONY L. COVIELLO

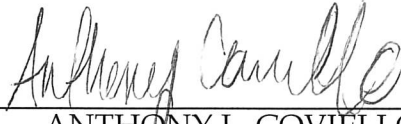
Dated: January 14, 2022

RULE 4:5-1 CERTIFICATION

1. I am the attorney for the plaintiff in the foregoing complaint.
2. The matter in controversy is not the subject of any pending arbitration proceeding or other action and no arbitration proceeding is contemplated in the future.

3. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

LAW OFFICES OF ANTHONY L. COVIELLO, LLC
Attorneys for Plaintiff(s)

BY: 

ANTHONY L. COVIELLO

DATED: January 14, 2022